



Transcend Wireless

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Town of Grafton
Planning Department
Joseph Laydon-Town Planner
30 Providence Rd.
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RECEIVED

AUG 13 2019

**PLANNING BOARD
GRAFTON, MA**

**RE: Project-T-Mobile L600-Eligible Facilities Request
160R Upton St.-TMO Site #4WL0919E**

Dear Mr.Laydon-

T-Mobile is an existing wireless provider located on the tower at 160R Upton St. and has proposed modifications to their existing installation as follows:

- Add (3) antennas per entitlements
- Add (3) associated RRU units
- Add (1) Fiber Hybrid cable

I have included Lease exhibits for your review that detail this modification. All work shall be completed within the existing tower compound and on the tower only for T-Mobile modification.

As you know, on February 22,2012 Congress enacted the "colocation by right"(Section 6409(a)) which mandates that State and Local governments approve any "Eligible Facilities Request".

Under Section 6409(a)(2)(A)-(C) and "Eligible Facilities Request" is any request to modify a Tower or Base Station that involves "collocations of new Transmission equipment", "removal", or "replacement" of Transmission Equipment. Six criteria have been outline in the FCC report and Order captioned, In re: Acceleration of Broadband Development by Improving Wireless Facilities Siting Policies (October 17,2014) Final Rule codified at 47 CFR Parts 1 and 17 promulgating regulations interpreting and implementing the provisions of the Spectrum Act. The Regulations determined that any modification to an existing tower that meets the criteria as set forth below, does not substantially change the physical dimensions of the existing tower and an Eligible Facilities Request must be granted.

1. The modifications do not increase the height of the tower by twenty feet or ten percent, whichever is greater. We are within the criteria of the mandate as the existing tower will not be increased.
2. The modifications to the Transmission Equipment do not protrude from the edge of the tower by twenty feet or more than the width of the tower (whichever is greater), at the level where the transmission equipment modifications are made.

3. The modifications to the Transmission Equipment do not involve the installation of more than the standard number of equipment cabinets for the technology involved
4. The modifications to the transmission Equipment do not entail any excavation or deployment outside of the Tower site;
5. The modifications to the Transmission Equipment do not defeat any existing concealment elements of the Tower
6. The modifications to the Transmission Equipment comply with prior conditions of approval of the tower unless the non-compliance is due to an increase in height, increase in width, addition of equipment cabinets, or new excavation that does not exceed the corresponding "substantial change" threshold in numbers 1-4

The proposed modification complies with all federal, state and local zoning and permitting requirements as is evidenced by the drawings provided. The proposed scope of work will not increase the towers height or width. The modification will not require excavation outside the tower site/compound as it presently exists. Lastly, the installation does not involve more than the standard number of cabinets.

It is our expectation that this application will be processed without any further delay and in a manner consistent with the applicable federal legislation. Thank you in advance for your consideration and cooperation.

Please feel free to contact me if you have any questions-

Warm regards-

Russell D. Palmer

Russell Palmer
Site Acquisition Specialist
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